

REMARKS

The Office Action mailed on March 21, 2008, was received and its contents carefully reviewed. Claims 1-33 were pending prior to the Office Action of March 21, 2008. In the above amendments, Applicants amended independent claims 1, 11, and 23 to highlight features of the present invention. Applicants also amended claims 5, 15, and 27 to change them from dependent claims to independent claims. Also, Applicants amended claims 3-10, 13-22, and 25-33 to provide additional context for the features of the invention and to correct informalities in the claims. Support for the above amendments may be found in the Specification at least in paragraphs [0011, 0138-0141] and in Figures 11 and 12 and throughout the Specification. Applicants respectfully submit that no new matter was introduced by these amendments.

Applicants also canceled claims 2, 12, and 24. As now recited, claims 1, 3-11, 13-23, and 25-33 remain pending and are believed to be in condition for allowance. Applicants respectfully request reconsideration of this application in light of the above amendments and the following remarks.

A. Prior Communications

Applicants appreciate the Examiner's acknowledgment of the present application as a continuation-in-part application of U.S. Patent Application Serial Number 10/388,161 filed on March 14, 2003, which claims benefit of priority of U.S. Provisional Application Serial Number 60/363,932 filed on March 14, 2002.

Applicants acknowledge the Examiner's consideration of the documents made of record in the parent application as well as the documents submitted on the Information Disclosure Statements (IDS) filed on December 13, 2004 and on February 19, 2008. While the Office Action Summary page listed the correct filing dates of these IDS papers, paragraph 4 of the Detailed Action incorrectly listed the IDS filing dates as February 4, 2003, and February 18, 2004. Applicants assume that this discrepancy is merely the result of a typographical error. If this is not correct, Applicants respectfully request clarification regarding consideration of the IDS materials previously filed.

B. Claim Rejections under 35 U.S.C. § 102

Claims 1-33 stand rejected under 35 U.S.C. § 102(e), as anticipated by Gilliam et al. U.S. Patent Number 7,206,765 (“the Gilliam patent”) as indicated beginning on page 3 of the March 21, 2008, Office Action. In view of the amendments above and the comments below, Applicants respectfully request reconsideration and withdrawal of this rejection.

The present invention is generally directed to controlling the use of content or other items through rights expressions associated with the content or the other items, and to a system and method for profiling rights expressions.

For example, amended independent claim 1 recites a method for creating a rights expression for association with an item for use in a system for controlling use of the item in accordance with the rights expression. The method of amended independent claim 1 includes specifying rights expression information indicating a manner of use of an item where the rights expression information includes at least one element, and the element has a variable and corresponding value for the variable. The method recited in claim 1 also includes generating a template of the rights expression information, including removing the value for the variable from the element, generating an identification for the template, and transmitting the identification for the template to a device adapted to situationally determine the variable and enforce the rights expression information based on the variable and the identification for the template. Claim 1 further recites that the rights expression information can be enforced on a device based on the variable and the identification for the template.

The Gilliam patent, on the other hand, discloses managing usage rights based on rules. The Gilliam patent appears to disclose a potential recipient specifying a first rights expression indicating a first manner of use of an item proposed by the potential recipient and a provider of an item specifying a second manner of use of the item and determining if there is a correspondence between the first rights expression and the second rights expression. See col. 3, of the Gilliam patent, starting on line 6.

1. The Gilliam Patent Does Not Disclose or Suggest Specifying an Element Having a Variable and Corresponding Value for the Variable

The Gilliam patent focuses on a system to manage usage rights by matching a rights expression of a potential recipient with a rights expression of a provider to specify and enforce property rights for items such as goods and services. See col. 5, lines 53-62. The Examiner asserts that the Gilliam patent discloses “a) specifying rights expression information indicating a manner of use of an item, said rights expression information including at least one element, said element having a variable and corresponding value for said variable,” and cites col. 7, lines 11-23; col. 8, lines 1-9; col. 23, lines 34-47; and col. 26, lines 2-15 of the Gilliam patent to support this assertion.

However, these sections of the Gilliam patent disclose that one or more conditions can be satisfied in order to exercise the manner of use in a specified usage right. See col. 7, starting at line 11. This section mentions a “manner of use” but does not disclose or suggest a method of creating a rights expression for controlling use of an item where the rights expression information includes at least one element, and the element has a variable and corresponding value for the variable as recited in claim 1 of the present application.

Additionally, in column 8, lines 3-4, the Gilliam patent discusses that a rights language can be used to express a rights expression specifying the rights, conditions, state variables, and the like, for the rights label. However, the mention of a “state variable” in the Gilliam patent is different than “an element having a variable” as recited in claim 1 of the present invention. A state variable is akin to a counter that represents how many times something has been used, while an “element having a variable” as recited in amended independent claim 1 is a profiling technique for omitting a particular piece of information, which can be a right, a resource, a principal, and the like. It is not a counter or a register that is updated as actions are performed.

Instead, the term “variable” in the present application is used with respect to a “template or profile”. In the present application, variables are the “holes” in the template. The present specification further discloses, “An exemplary encoding process can include removing one or more values for variable fields from a rights expression to generate a template or profile for the rights expression.” Please see paragraph [0044] of the present application. “It is determined whether or not the license is in the profile by comparing the license and the profile to determine if the license and the profile are similar except for having different values for one or more corresponding variable values.” See paragraph [0077] and Figure 2 of the present application. As such, Applicants respectfully submit that the Gilliam patent fails to disclose or suggest specifying rights expression information including an element having a variable and corresponding value for the variable as recited in claim 1 of the present application.

2. The Gilliam Patent Does Not Disclose or Suggest Generating a Template of the Rights Expression Information, Including Removing the Value for the Variable from the Element

Amended independent claim 1 of the present application also recites, “generating a template of said rights expression information, including removing said value for said variable from said element” The Examiner asserts that the Gilliam patent discloses this limitation and cites col. 9, lines 6-22; col. 11, lines 6-11; and col. 7, lines 39-55 of the Gilliam patent to support this assertion. However, in the cited portions of the Gilliam patent, there is no disclosure or suggestion of removing the value for the variable from the element of the rights expression information as recited in claim 1 of the present application. Instead, col. 9, lines 6-22 discusses conditions and prerequisites that are to be satisfied before a license server in accordance with the Gilliam patent is accessed by a Web server. The license server then generates the license. The Gilliam patent goes on to discuss that the license can include usage rights, but there is no disclosure or suggestion that the value for the variable is removed from the element as required by claim 1 of the present application.

The other portions of the Gilliam patent also fail to disclose or suggest the claimed limitation. For example, in col. 11, lines 6-11, the Gilliam patent discloses that the rights offer may include creating, deriving, or otherwise utilizing information that relates to rights expressions, and that in an exemplary embodiment, the rights offer can be in the form of a pre-defined specification, profile, template, and the like, that can be associated with the protected content. This portion of the Gilliam patent appears to discuss a rights offer as a completed profile or template, but there is no disclosure or suggestion of removing the value for the variable from the element of the rights expression information as recited in claim 1 of the present application. The license in the Gilliam patent has all the values filled in, while a license in accordance with the present invention has a template generated and is represented by a template identification in conjunction with the values of the variables.

Similarly, in col. 7, lines 39-55 of the Gilliam patent, the discussion relates to state variables and not to variable fields in a license that may be removed to generate a template. In the cited portions of the Gilliam patent, there is no disclosure or suggestion of removing the value for the variable from the element of the rights expression information as recited in claim 1 of the present application. Instead, col. 7, lines 39-55 discusses an exemplary embodiment where:

[S]tate variables can be used to track dynamic states, conditions, and the like. For example, the state variables can include variables having values that represent the status of an item, the status of usage rights, the status of a license or other dynamic conditions. The state variables can be tracked, for example, by clearinghouse 160 or another device, based on identification mechanisms in the license 142 and the ticket 134.

The Gilliam patent goes on to discuss an exemplary embodiment where the value of the state variables can be used in a condition.

For example, a usage right can include the right to redeem the item ticket 134 for specified goods and a condition can include that the usage right can be exercised three times. Each time the usage right is exercised, the value of the state variable can be incremented. In an exemplary embodiment, when the value of the state variable reaches three, the condition can no longer be satisfied and the ticket 134 can no longer be redeemed.

See the Gilliam patent, col. 7, lines 39-46.

However, there is no disclosure or suggestion in the Gilliam patent that the value for the variable is removed from the element as required by claim 1 of the present invention. State variables are not in the rights expression recited in claim 1 of the present invention, and as described above, state variables are not the same as the variable fields in the template. The Examiner's interpretation that the Gilliam patent's "each time the usage rights [sic] is exercised, the value of the state variable can be incremented" somehow discloses that the value for the variable is removed from the element is unfounded and is not supported by the Gilliam patent. As such, Applicants respectfully submit that the Gilliam patent fails to disclose or suggest generating a template of said rights expression information, including removing said value for said variable from said element as recited in claim 1 of the present application.

3. The Gilliam Patent Does Not Disclose or Suggest Generating an Identification for the Template

Amended independent claim 1 of the present application recites, "generating an identification for said template," and the Examiner asserts that the Gilliam patent discloses this limitation, citing Figures 1 and 3 of the Gilliam patent and the associated text. Figure 1 of the Gilliam patent illustrates "an exemplary digital rights management system on which various exemplary embodiments of the present [Gilliam] invention can be implemented" while Figure 3 illustrates an exemplary license that can be employed in the exemplary systems of the Gilliam patent. See the Brief Description of the Drawings in the Gilliam patent. As shown below, nowhere in either figure is an identification for a template indicated.

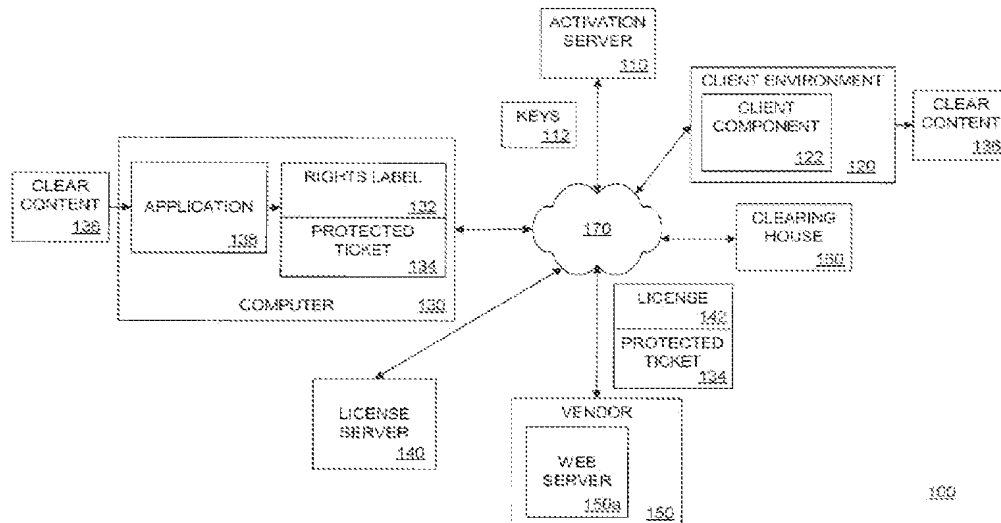


FIG. 1

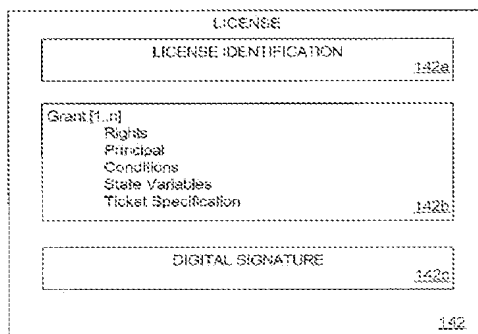


FIG. 3

The accompanying text to Figs. 1 and 3 also fails to disclose generation of an identification for the template. To wit, while Fig. 3 of the Gilliam patent discloses a license identification 142a, this is not the same as the template identification recited in amended independent claim 1. The accompanying text to Fig. 3 makes this clear stating:

FIG. 3 illustrates an exemplary license that can be employed in the exemplary systems of FIGS. 1 and 5. In FIG. 3, a rights expression in the form of the license 142, for example, can include a unique license identification (ID) 142a and a grant 142b, for example, including usage rights, a principal, conditions, state variables, and a ticket specification designating an associated item ticket 134. The license 142 also can include a digital signature 142c, including any suitable cryptographic keys, and the like, for unlocking item ticket 134.

See col. 6, lines 47-56 of the Gilliam patent.

Similarly, the accompanying text to Figure 1 describes a digital rights management system and the modules and components that make up the system, but nowhere in the Gilliam patent is there any indication of generation of a template identification as required by amended independent claim 1 of the present application. As such, Applicants respectfully submit that the Gilliam patent fails to disclose or suggest generating an identification for said template as recited in claim 1 of the present application.

4. The Gilliam Patent Does Not Disclose or Suggest Transmitting the Identification for the Template to a Device Adapted to Situationally Determine the Variable and Enforce the Rights Expression Information Based on the Variable and the Identification for the Template

Applicants amended independent claim 1 of the present application to highlight the transmission of the identification for the template to a device adapted to situationally determine the variable and enforce the rights expression information based on the variable and the identification for the template. Since the Gilliam patent fails to disclose generating an identification for the template, the Gilliam patent cannot disclose transmitting the generated identification for the template to a device, much less a device adapted to situationally determine the variable and enforce the rights expression information based on the variable and the identification for the template. As such, Applicants respectfully submit that the Gilliam patent fails to disclose or suggest transmitting the identification for the template to a device adapted to situationally determine the variable and enforce the rights expression information based on the variable and the identification for the template as recited in claim 1 of the present application.

5. The Gilliam Patent Does Not Disclose or Suggest the Rights Expression Information Can Be Enforced on a Device Based on the Variable and the Identification for the Template

Amended independent claim 1 of the present application recites specifying rights expression information whereby rights expression information can be enforced on a device based on the variable and the identification for the template.

The Examiner asserts that the Gilliam patent discloses this limitation and cites the Abstract and claim 1 of the Gilliam patent to support this assertion. However, in the cited portions of the Gilliam patent, there is no disclosure or suggestion of rights expression information that can be enforced on a device based on the variable and the identification for the template as recited in claim 1 of the present application. Instead, the Abstract of the Gilliam patent merely describes enforcing rights expressions specifying manners of use of an item. The Gilliam patent discusses managing usage rights based on rules but fails to disclose or suggest that rights expression information is enforced on a device based on the variable and the identification for the template. Similarly, claim 1 of the Gilliam patent merely recites a method for enforcing rights expressions by matching a potential recipient of an item (and their first rights expression) to the provider of the item (and their second rights expression). If the rights expressions match, the manner of use is granted. There is no disclosure of rights expression information that can be enforced on a device based on the variable and the identification for the template as recited in claim 1 of the present application.

In the present application, the profile of the rights expression information identifies subsets of the rights expression language that a particular interpreter supports and interprets by an encoding process that removes one or more values for variable fields from a rights expression (see paragraphs [0043-0046] of the present application). Profiling is employed to allow resource-constrained devices to participate in a rights-interpreted language system (see paragraph [0043] of the present application).

As indicated above, the Gilliam patent fails to disclose or suggest all the elements recited in amended independent claim 1 of the present application. Applicants respectfully submit that the Gilliam patent fails to anticipate amended independent claim 1 under 35 U.S.C. § 102(e) and that amended independent claim 1 is in proper condition for allowance. Applicants respectfully request reconsideration of amended independent claim 1 and the withdrawal of the rejection under 35 U.S.C. § 102(e).

6. The Dependent Claims and the Related Claims Are Not Anticipated by the Gilliam Patent

Claims 3 and 4 and claims 8-10 of the present application depend upon independent claim 1 and thereby include all the limitations of claim 1 while reciting additional features of a method of the present invention. Applicants respectfully traverse the rejection of claims 3 and 4 and claims 8-10 for similar reasons as outlined above with regard to the rejection of claim 1 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 1 of the present application. Therefore, the applied reference also fails to disclose all the features and limitations of dependent claims 3 and 4 and claims 8-10 as well. Accordingly, Applicants respectfully submit that claims 3 and 4 and claims 8-10 are allowable at least by virtue of their dependency upon claim 1 as outlined above. Applicants respectfully request reconsideration and withdrawal of the rejection of claims 3 and 4 and claims 8-10 under 35 U.S.C. § 102.

Applicants amended claim 5 to recite a related method of the present invention similar to amended independent claim 1 of the present application. Claim 1 and claim 5 are related claims that recite methods for determining untransmitted variable values in accordance with the present invention.

Claim 1 recites the case where the untransmitted variable value is determined based on the situation. For example, if the template identification was for a region-locked rights expression, instead of transmitting the template identification along with the region "US" to a device situated in the United States, a sender could just transmit

the template identification if he expected the device to automatically fill in the unspecified region variable with the value “US”.

Claim 5 recites the case where the untransmitted variable value is determined by instructions transmitted along with the template identification. For example, if the template identification was for a region-locked rights expression, instead of transmitting the template identification along with the region “US” to a device situated in the United States, a sender could transmit the template identification along with a piece of code such as “mapUnit.GetCountry(gpsUnit.GetLocation())”. The device would run that piece of code, which, since the device is in the US, would result in a value of “US” being returned. The device would then use this value for the variable.

As an additional example, claim 5 can also cover a case where a rights expression is for viewing, printing, and extracting of a document. The template used in this case might have three variables for the expiration dates of viewing, printing, and extracting, respectively. However, instead of transmitting all the variable values, perhaps only the expiration date for viewing is transmitted. Additionally, instructions for the other two variables are transmitted, such as “printingExpiration = viewingExpiration – 7 days; extractingExpiration = printingExpiration – 7 days”. In this case, everything to reconstruct the rights expression is transmitted and nothing needs to be determined from context.

As outlined above with regard to amended claim 1, however, the Gilliam patent fails to disclose or suggest all the elements and limitations recited in independent claim 1 of the present application. Similarly, the Gilliam patent also fails to disclose all the related elements and limitations of independent claim 5 as well.

Similarly, independent claim 11 recites a system in means-plus-function form that carries out the method recited in independent claim 1. As such, the limitations and features of independent claim 11 are closely related to the steps recited in independent method claim 1. Applicants respectfully submit that the Gilliam patent also fails to disclose all the elements of claim 11 of the present invention. Therefore, Applicants respectfully submit that claim 11 is allowable over the cited reference for

at least the reasons outlined above with regard to claim 1. Applicants respectfully request that the rejection of claim 11 under 35 U.S.C. § 102 be withdrawn.

Claims 13, 14, and 18-22 of the present application depend upon claim 11 and thereby include all the limitations of independent claim 11 while reciting additional features of a system of the present invention. Applicants respectfully traverse the rejection of claims 13, 14, and 18-22 for similar reasons as outlined above with regard to the rejection of claim 11 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 11 of the present application. Therefore, the applied reference fails to disclose all the features and limitations of dependent claims 13, 14, and 18-22, as well. Accordingly, Applicants respectfully submit that claims 13, 14, and 18-22 are allowable at least by virtue of their dependency upon claim 11 as outlined above. Applicants respectfully request reconsideration and withdrawal of the rejection of claims 13, 14, and 18-22 under 35 U.S.C. § 102.

Applicants amended claim 15 to recite related systems of the present invention similar to the system recited in amended independent claim 11 of the present application. Claims 11 and 15 are related claims that recite systems for determining untransmitted variable values in accordance with the present invention.

As outlined above with regard to amended claims 1 and 11, the Gilliam patent fails to disclose or suggest all the elements and limitations recited in independent claims 1 and 11 of the present application. Similarly, the Gilliam patent also fails to disclose or suggest all the related elements and limitations of independent claim 15 as well. Therefore, Applicants respectfully submit that claim 15 is allowable over the cited reference for at least the reasons outlined above with regard to claims 1 and 11. Applicants respectfully request that the rejection of claim 15 under 35 U.S.C. § 102 be withdrawn.

As above, claims 16 and 17 depend upon independent claim 15. These dependent claims thereby include all the limitations of independent claims 15 while reciting additional features of systems of the present invention. Applicants respectfully traverse the rejection of claims 16 and 17 for similar reasons as outlined

above with regard to the rejection of claim 15 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 15 of the present application. Therefore, the applied reference fails to disclose all the features and limitations of dependent claims 16 and 17 as well. Accordingly, Applicants respectfully submit that claims 16 and 17 are allowable at least by virtue of their dependency upon claim 15 as outlined above. Applicants respectfully request reconsideration and withdrawal of the rejection of claims 16 and 17 under 35 U.S.C. § 102.

Amended independent claim 23 recites a device in means-plus-function form for controlling use of an item in accordance with a rights expression created in accordance with the method recited in independent claim 1. As such, the limitations and features of independent claim 23 are closely related to the steps recited in independent method claim 1. As was the case with the method of claim 1, Applicants respectfully submit that the Gilliam patent fails to disclose all the elements of claim 23 of the present invention. Therefore, Applicants respectfully submit that claim 23 is allowable over the cited reference for at least the reasons outlined above with regard to claim 1. Applicants respectfully request that the rejection of claim 23 under 35 U.S.C. § 102 be withdrawn.

Likewise, claims 25, 26, and 30-33 of the present application depend upon claim 23 and thereby include all the limitations of independent claim 23 while reciting additional features of a device of the present invention. Applicants respectfully traverse the rejection of claims 25, 26, and 30-33 for similar reasons as outlined above with regard to the rejection of claim 23 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 23 of the present application. Therefore, the applied reference fails to disclose all the features and limitations of dependent claims 25, 26, and 30-33 as well. Accordingly, Applicants respectfully submit that claims 25, 26, and 30-33 are allowable at least by virtue of their dependency upon claim 23 as outlined above. Applicants respectfully request reconsideration and withdrawal of the rejection of claims 25, 26, and 30-33 under 35 U.S.C. § 102.

Applicants amended claim 27 to recite a related device of the present invention similar to amended independent claim 23 of the present application. Claims 23 and 27 are related claims that recite devices for determining untransmitted variable values in accordance with the present invention.

As outlined above with regard to amended claims 1, 5, 11, 15, and 23, however, the Gilliam patent fails to disclose or suggest all the elements and limitations recited in these independent claims of the present application. Similarly, the Gilliam patent also fails to disclose or suggest all the related elements and limitations of independent claim 27 as well. Therefore, Applicants respectfully submit that claims 27 is allowable over the cited reference for at least the reasons outlined above with regard to claims 1, 5, 11, 15, and 23. Applicants respectfully request that the rejection of claim 27 under 35 U.S.C. § 102 be withdrawn.

As above, claims 28 and 29 depend upon independent claim 27. These dependent claims thereby include all the limitations of independent claim 27 while reciting additional features of devices of the present invention. Applicants respectfully traverse the rejection of claims 28 and 29 for similar reasons as outlined above with regard to the rejection of claim 27 under 35 U.S.C. § 102. As discussed above, the cited reference fails to disclose all the elements and limitations recited in independent claim 27 of the present application. Therefore, the applied reference fails to disclose all the features and limitations of dependent claims 28 and 29 as well. Accordingly, Applicants respectfully submit that dependent claims 28 and 29 are allowable at least by virtue of their dependency upon claim 27 as outlined above. Applicants respectfully request reconsideration and withdrawal of the rejection of claims 28 and 29 under 35 U.S.C. § 102.

C. Claims Recited Using “Means For” Language

In paragraph 8 of the March 21, 2008, Office Action, the Examiner took the position that “the ‘means for’ phrase(s) do not invoke 35 U.S.C. 112, 6th paragraph [sic].” The Examiner then requested “Applicant(s) to either amend the claim(s) to

remove all instances of ‘means for’ from the claims(s), or to explicitly state on the record why 35 U.S.C. 112 6th paragraph should not be invoked.”

This position is contrary to settled case law. The Court of Appeals for the Federal Circuit held that a means or step-plus function limitation should be interpreted by the U.S. Patent and Trademark Office with regard to the structure, material, or acts disclosed in the specification and equivalents that correspond to such language. *See In re Donaldson* 29 USPQ2d 1845 (Fed. Cir. 1994).

A claim limitation will invoke 35 U.S.C. §112, sixth paragraph, if it meets the following 3-prong analysis, namely (a) the claim limitations must use the phrase “means for” or “step for;” (b) the “means for” or “step for” must be modified by functional language; and (c) the phrase “means for” or “step for” must not be modified by sufficient structure, material, or acts for achieving the specified function.

In the present application, the subject elements in the claims meet the first prong of the analysis by reciting the phrase “means for”. Similarly, the “means for” phrase is modified by functional language, and thereby meets the second prong of the analysis. Further, the subject claims meet the third prong of the analysis because the phrase “means for” is not modified by sufficient structure, material, or acts for achieving the specified function. *See In re Donaldson* 29 USPQ2d 1845 (Fed. Cir. 1994). The subject elements in the claims are set forth, at least in part, by the function they perform as opposed to the specific structure, material, or acts that perform the function. *See York Prod., Inc. v. Central Tractor Farm & Family Center*, 99 F.3d 1568, 1574 (Fed. Cir. 1996); see also MPEP § 2181.

While the converse position espoused by the Examiner is true, namely, a claim element not using “means for” or “step for” will not be considered to invoke 35 U.S.C. §112, sixth paragraph, the term “means” gives rise to a presumption that the inventor used the term advisedly to involve the statutory mandates for means-plus-function clauses. *York Prod., Inc. v. Central Tractor Farm & Family Center*, 99 F.3d 1568, 1574 (Fed. Cir. 1996). While the presumption is not conclusive, Applicants respectfully assert that subject means-for clauses of the subject claims invoke 35 U.S.C. §112, sixth paragraph by virtue of the three prong analysis outlined above. If

the Examiner believes that the subject claims do not invoke 35 U.S.C. §112, sixth paragraph, Applicants respectfully request that the Examiner provide an explanation in the next correspondence.

D. Conclusion

In view of the above amendments and remarks, Applicants respectfully request the Examiner's reconsideration of this application and the timely allowance of the pending claims. Except for issue fees payable under 37 C.F.R. § 1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application including fees due under 37 C.F.R. §§ 1.16 and 1.17 which may be required, including any required extension of time fees, or credit any overpayment to Deposit Account No. 19-2380.

Respectfully submitted,

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